

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe (K.S.)

Plaintiff,

v.

Case No. 1:23-cv-04032

Brisam Clinton LLC d/b/a Comfort Inn, Cavalier
Mergersub LP f/k/a Corepoint Lodging, Inc.,
Choice Hotels International Inc., d/b/a Comfort
Inn, CPLG Prime Mezz LLC f/k/a BRE/Prime
Mezz LLC d/b/a La Quinta Inn & Suites, Hilton
Management LLC d/b/a Hilton, La Quinta
Franchising, LLC, La Quinta Holdings Inc., LQ
Management LLC, MK LCP Rye LLC d/b/a
Hilton, Wyndham Hotels & Resorts, LLC d/b/a
La Quinta Inn & Suites,

Defendants.

NOTICE OF SUPPLEMENTAL AUTHORITY

Defendant Hilton Management LLC (“Hilton”) respectfully requests that this Court consider the decision from *Jane Doe (L.M.) v. 42 Hotel Raleigh LLC, et al.*, Case No. 5:23-cv-235-FL (E.D.N.C. Feb. 13, 2024) issued on February 13, 2024 in the Eastern District of North Carolina. A true and correct copy of the court’s order dismissing TVPRA claims against a Hilton affiliate is attached as Exhibit A to this notice. Hilton believes this supplemental authority is pertinent to the issues raised in Hilton’s Motion to Dismiss the First Amended Complaint (“Motion to Dismiss”) (Dkt. 94). In particular, in a case involving the same plaintiff’s counsel and complaint template, the *L.M.* court evaluated equally conclusory force, fraud, or coercion allegations to those put at issue by plaintiff in this matter, and found them insufficient at the dismissal stage with no leave to amend. Hilton respectfully requests that the Court consider this supplemental authority in regard to Hilton’s pending Motion to Dismiss.

Dated: February 15, 2024

Respectfully submitted,

/s/ Nicole M. Perry

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Attorneys for Defendant Hilton Management LLC

CERTIFICATE OF SERVICE

I, Nicole M. Perry, certify that on February 15, 2024, I caused the foregoing Notice of Supplemental Authority to be filed with the Clerk of the Court and served upon all counsel of record via the Court's CM/ECF system.

/s/ Nicole M. Perry

Nicole M. Perry

*Attorney for Defendant Hilton Management
LLC*